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FILED

JAN 16 1998

AT 8:30 M
WILLIAM T. WALSH
CLERK

WALSH SECURITIES, INC.,

Plaintiff,

- vs -

CRISTO PROPERTY MANAGEMENT
LTD., et al.,

Defendants.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Civil Action No. 97-3496 (WGB)

**NOTICE OF MOTION
TO STAY PROCEEDINGS**

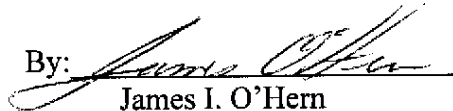
TO: Michael Chertoff, Esq.
Latham & Watkins
One Newark Center, 16th Floor
Newark, New Jersey 07101

PLEASE TAKE NOTICE that, on February 9, 1998, at 10:00 in the forenoon, or as soon thereafter as counsel may be heard, the undersigned counsel for defendant Stanley Yacker shall move before the Honorable William G. Bassler, United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order staying all proceedings against defendant Yacker in this civil action pending resolution of a criminal proceeding instituted by the United States Attorney for the District of New Jersey, and extending the time for Mr. Yacker to answer and or otherwise respond to any claims against him in this matter until said criminal proceedings are resolved.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, the defendant shall rely upon the Memorandum of Law, and Affidavit of Lawrence S. Lustberg, Esq., submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

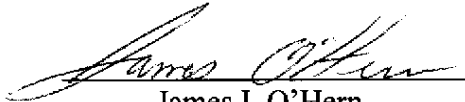
**GIBBONS, DEL DEO, DOLAN,
GRIFFINGER & VECCHIONE**
A Professional Corporation
Attorneys for Defendant
Stanley Yacker

By: 
James I. O'Hern

Dated: January 15, 1998

CERTIFICATION OF SERVICE

I hereby certify that on the 15th day of January 1998, I caused a copy of defendant Stanley Yacker's Notice of Motion to Stay Proceedings, Memorandum of Law in Support thereof, Affidavit of Lawrence S. Lustberg, Esq., and proposed form of Order, to be served via overnight mail to the attached service list.


James I. O'Hern

Dated: January 15, 1998

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